



Littler Mendelson, P.C.
900 Third Avenue
New York, NY 10022.3298

Roya Aghanori
212.583.2667 direct
212.583.9600 main
raghanori@littler.com

July 21, 2025

VIA ECF

Hon. Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Castillo et al v. Albert Einstein College of Medicine Inc. et al*,
SDNY No. 1:24-cv-0984

Dear Judge Engelmayer:

We represent Defendants in the above-captioned action. We submit this letter to request a brief adjournment of the conference scheduled to discuss the parties' ESI protocol dispute (Doc. 58). The conference is currently scheduled for July 22, 2025, at 2:30 p.m. Plaintiff has consented to this request but has noted they are only available to adjourn the conference to anytime on July 23, or July 24 before 2:00 p.m. Defendants are available anytime between July 23 through August 1.

We appreciate the Court's consideration and prompt scheduling of a conference to discuss the protocol issue per Defendants' request (Doc. 57). However, Defendant's attorney Denise Backhouse, who is best suited to address these issues with the Court, will be in-flight from Europe to New York on July 22. However, Ms. Backhouse remains available to participate any other day after July 22, this week or next week.

Ms. Backhouse has played a significant role in this case as the sole attorney responsible for handling all electronic discovery matters including the ESI protocol, confidentiality and protective order. Ms. Backhouse specializes in eDiscovery issues and has spent several hours reviewing and responding to protocol edits, both in writing and during each meet and confer.

Accordingly, Defendants submit their request for a brief adjournment to allow Ms. Backhouse to participate in the conference with your Honor, as she is the only attorney suited to explain Defendants' position on the nature, history and complexities of the dispute.

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Thank you for your consideration.

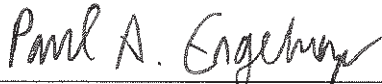
Sincerely,

/s/ Roya Aghanori

Roya Aghanori

GRANTED. The discovery conference is hereby adjourned to Wednesday, July 23, 2025, at 11:45 a.m. The dial-in information remains the same.

SO ORDERED.

A handwritten signature in dark ink, reading "Paul A. Engelmayer", is written over a horizontal line.

PAUL A. ENGELMAYER
United States District Judge

Date: July 21, 2025